

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	FOURTEENTH JUDICIAL CIRCUIT
COUNTY OF BEAUFORT	)	
	)	
MYRTIS M. PARKER,	)	
	)	SUMMONS
Plaintiff,	)	(Jury Trial Demanded)
	)	
vs.	)	
	)	
ENMARKET,	)	
	)	
Defendant.	)	

TO: ENMARKET, DEFENDANT HEREIN:

YOU ARE HEREBY SUMMONED and required to Answer the Complaint in this action, a copy of which is herewith served upon you, and to serve a copy of your Answer upon the subscriber at his office, DORE LAW OFFICE, LLC., POST OFFICE BOX 2478, BEAUFORT, SOUTH CAROLINA 29901, within thirty (30) days from the date of service hereof; exclusive of the day of such service; and if you fail to answer the Complaint within the time aforesaid, the Plaintiff in this action will apply to the Court for a judgment by default and the relief demanded in the attached Complaint.

**DORE LAW OFFICE, LLC.**

s/Anthony O. Dore  
Anthony O. Dore  
Attorney for Plaintiff  
P.O. Box 2478  
Beaufort, SC 29901  
(P) 843.522.9112  
(F) 843.522.8050

BEAUFORT, SOUTH CAROLINA  
August \_\_\_\_, 2021

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	FOURTEENTH JUDICIAL CIRCUIT
COUNTY OF BEAUFORT	)	
	)	
MYRTIS M. PARKER,	)	
Plaintiff,	)	COMPLAINT
	)	(Jury Trial Demanded)
vs.	)	
	)	
ENMARKET,	)	
	)	
Defendant.	)	

The Plaintiff, complaining of the Defendant, alleges:

1. That the Plaintiff is a resident of Beaufort County, State of South Carolina.
2. That the Defendant, hereinafter referred to as Corporation organized and existing and doing business in South Carolina, at 3076 Trask Parkway, Beaufort, South Carolina 29906, is a convenient store that sells gasoline for automobiles.
3. That the Plaintiff was injured while she was in the store, struck by the door when an employee of the store opened the door causing her great pain. Leaving the store to go to her vehicle, she slipped on loose rocks in the parking lot which was being repaired at the time of the fall. This happened on the premise of Enmarket, in Beaufort, South Carolina.
4. That this Court has jurisdiction of both the Plaintiff and the Defendant, and the subject matter thereof.
5. That venue is proper in the County of Beaufort as the incident occurred in Beaufort County.

6. That on or about October 7, 2020 in Beaufort, South Carolina, the Plaintiff, Myrtis M. Parker was a customer and invitee at Enmarket. That the Plaintiff while she was in the store, was struck by the door when an employee of the store opened the door causing the door to impact her arm. When the Plaintiff was leaving the store to go to her vehicle, she slipped on loose rocks in the parking lot which was being repaired at the time of the fall. This happened on the premise of Enmarket, in Beaufort, South Carolina.
7. That as a result of the slip and fall the Plaintiff was severely injured.
8. That the injuries and damages sustained by the Plaintiff were due to and caused by, and were the direct and proximate result of the negligent, careless, reckless, heedless, and wanton acts and conduct of the Defendant, in one or more of the following particulars, to wit:
  - a. In failing to maintain the parking lot for a safe condition to ensure that the Plaintiff would not be caused to slip and fall as a result of loose stones in the parking lot, which was known or should have been known to the Defendant;
  - b. In failing to properly inspect the parking lot wherein the Plaintiff was caused to fall as a result of not ensuring that the parking lot was safe;
  - c. In failing to properly inspect the parking lot owned by the Defendant in good and safe conditions for the Plaintiff and others;
  - d. In such other and farther particulars as the evidence of trial may prove.
9. That as a direct and proximate result of the careless, reckless, heedless, and wanton acts and conduct as above set forth, the Plaintiff was injured and damaged in the following particulars, to-wit:

- a. arm;
- b. shoulder;
- c. back;
- d. hip;
- e. leg;

10. That the Plaintiff's injuries have necessitated expensive and extensive medical care and treatment, including but not limited to the costly care and treatment of several doctors and that the Plaintiff has incurred substantial out of pocket expenses.

11. That the Plaintiff continues to suffer from pain and discomfort as a result of their injuries and is informed and believes the same will continue.

12. That the Plaintiff has lost wages as a result of this collision and injuries resulting therefrom.

WHEREFORE, Plaintiff prays for judgment against the Defendant for both actual and punitive damages in such amounts as may be awarded by a jury.

**DORE LAW OFFICE, LLC**

s/Anthony O. Dore  
Anthony O. Dore  
Attorney for Plaintiff  
P.O. Box 2478  
Beaufort, SC 29901  
(P) 843.522.9112  
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BEAUFORT, SOUTH CAROLINA  
August \_\_\_\_ 2021

BEAUFORT COUNTY SHERIFF'S OFFICE  
PJ TANNER, SHERIFF  
PO Box 1758  
Beaufort, SC 29901

STATE OF SOUTH CAROLINA  
BEAUFORT COUNTY

Process Number: 212848

Court Number: 2021CP0701481

ENMARKET (Defendant)

AFFIDAVIT OF SERVICE

Service of: ENMARKET (Defendant)  
3076 TRASK PKWY; ENMARK 120  
Burton, SC 29906

Deputy HERLONG says on oath that on the 25th day of August, 2021 at 09:26:35 he/she served the SUMMONS AND COMPLAINTS on ENMARKET (Defendant) by delivering unto MICHELLE CRANDELL, at 3076 TRASK PKWY; ENMARK 120, BURTON, SC 29906 personally copy(ies) thereof. Service of process was made in accordance with applicable statutes and the Rules of Civil Procedures in effect at the time of service.

I also certify that I endorsed on the said copy the date of service, signed my name, and added my official title thereto.

NOTARY STATEMENT  
SPORN to me on this the 27th day of August, 2021.  
Notary Public For The State of South Carolina  
My Commission Expires 11/2/20

Herlong, R